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17	UNITED STATES	DISTRICT COURT
18	NORTHERN DISTRI	ICT OF CALIFORNIA
19	SAN JOSE	DIVISION
20	MAXIMILIAN KLEIN, et al., on behalf of	Case No. 5:20-cv-08570-JD
21	themselves and all others similarly situated,	[PROPOSED] ORDER REGARDING
22	Plaintiffs,	DEFENDANT'S RESPONSE TO PLAINTIFFS' ADMINISTRATIVE
23	V.	MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL
24	META PLATFORMS, INC., a Delaware Corporation,	SHOULD BE SEALED
25	Defendant.	Judge: Hon. James Donato
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THIS MATTER, having come before the Court on Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, and the Court having considered the Declaration of Jitin Khurana In Support of Defendant's Response to Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, and other appropriate papers:

The Court finds compelling reasons to support the filing under seal of the portions of documents described herein. Accordingly,

IT IS ORDERED that the following portions of documents shall be filed under seal and sealed from the public record:

Information in FAC and Redline Sought to Be Sealed ¹	Reason for Sealing
Redacted information at Table of Contents,	Contains non-public information regarding
page ii ²	specific terms of a contract with a business
	counterparty which, if revealed to competitors
	or counterparties, could cause competitive
	harm to Meta. (See Khurana Decl. ¶ 7).
Redacted information at ¶ 9	Contains non-public information regarding
	specific terms of a contract with a business
	counterparty which, if revealed to competitors
	or counterparties, could cause competitive
	harm to Meta. (See Khurana Decl. ¶ 8).
Redacted information at ¶ 10	Contains non-public information regarding
	specific terms of a contract with a business
	counterparty which, if revealed to competitors
	or counterparties, could cause competitive
	harm to Meta. (See Khurana Decl. ¶ 7).
Redacted information at ¶ 179	Contains non-public information regarding
	contracts with business counterparties to
	whom Meta owes a duty of confidentiality.
Redacted information at ¶ 180	Contains non-public information regarding
	contracts with business counterparties to
	whom Meta owes a duty of confidentiality.
Redacted information at ¶ 305	Contains non-public information regarding
	contracts with business counterparties to
	whom Meta owes a duty of confidentiality.
Redacted information at ¶ 307	Contains non-public information regarding a
	contract with a business counterparty to
	whom Meta owes a duty of confidentiality.

¹ The citations in the Redline are identical to those in the FAC.

² Meta has not provided line numbers for its proposed redactions because the FAC is formatted such that the text does not always align with the line numbers.

1	Redacted information at ¶ 309	Contains non-public information regarding
2		contracts with business counterparties to
2		whom Meta owes a duty of confidentiality.
3	Redacted information at ¶ 310	Contains non-public information regarding
		contracts with business counterparties to
4	D 1 / 1' C / / #212	whom Meta owes a duty of confidentiality.
5	Redacted information at ¶ 313	Contains non-public information regarding contracts with business counterparties to
		whom Meta owes a duty of confidentiality.
6	Redacted information at page 100, heading	Contains non-public information regarding
7	C.1	specific terms of a contract with a business
, l		counterparty which, if revealed to competitors
8		or counterparties, could cause competitive
		harm to Meta. (See Khurana Decl. ¶ 7).
9	Redacted information at ¶ 436	Contains non-public information regarding
10		specific terms of a contract with a business
		counterparty which, if revealed to competitors
11		or counterparties, could cause competitive
12	D 1 + 1: 6 + 427	harm to Meta. (See Khurana Decl. ¶ 7).
12	Redacted information at ¶ 437	Contains non-public information regarding
13		specific terms of a contract with a business
		counterparty which, if revealed to competitors
14		or counterparties, could cause competitive
1.5	Redacted information at ¶ 438	harm to Meta. (<i>See</i> Khurana Decl. ¶ 7). Contains non-public information regarding
15	Redacted information at 438	specific terms of a contract with a business
16		counterparty which, if revealed to competitors
		or counterparties, could cause competitive
17		harm to Meta. (See Khurana Decl. ¶ 7).
18	Redacted information at ¶ 440	Contains non-public information regarding
16	"	advertising sales to individual advertisers
19		which, if revealed to competitors or
20		counterparties, could cause competitive harm
20		to Meta. (See Khurana Decl. ¶ 9).
21	Redacted information at ¶ 441	Contains non-public information regarding
		negotiation strategy and which, if revealed to
22		competitors or counterparties, could cause
23		competitive harm to Meta. (See Khurana
23	Redacted information at ¶ 442	Decl. ¶ 6). Contains non-public information regarding
24	Redacted information at 442	negotiation strategy and which, if revealed to
2.		competitors or counterparties, could cause
25		competitive harm to Meta. (See Khurana
26		Decl. ¶ 6).
	Redacted information at ¶ 443	Contains non-public information regarding
27	<u>"</u>	negotiation strategy and which, if revealed to
28		competitors or counterparties, could cause
20		

1		competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 6).
2	Redacted information at ¶ 444	Contains non-public information regarding
3		negotiation strategy and which, if revealed to competitors or counterparties, could cause
4		competitive harm to Meta. (See Khurana Decl. ¶ 6).
5	Redacted information at ¶ 445	Contains non-public information regarding negotiation strategy and which, if revealed to
7		competitive harm to Meta. (See Khurana
8	Dadastad information at ¶ 446	Decl. ¶ 6).
9	Redacted information at ¶ 446	Contains non-public information regarding negotiation strategy and which, if revealed to
9		competitive harm to Meta. (See Khurana
10		Decl. ¶ 6).
11	Redacted information at ¶ 447	Contains non-public information regarding negotiation strategy and which, if revealed to
12		competitors or counterparties, could cause
13		competitive harm to Meta. (See Khurana Decl. ¶ 6).
14	Redacted information at ¶ 448	Contains non-public information regarding negotiation strategy and which, if revealed to
15		competitors or counterparties, could cause
16		competitive harm to Meta. (See Khurana Decl. ¶ 6).
17	Redacted information at ¶ 449	Contains non-public information regarding
18		negotiation strategy and which, if revealed to competitors or counterparties, could cause
		competitive harm to Meta. (See Khurana
19	Dadastad information at ¶ 450	Decl. ¶ 6).
20	Redacted information at ¶ 450	Contains non-public information regarding negotiation strategy and which, if revealed to
21		competitive harm to Meta. (See Khurana
22		Decl. ¶ 6).
23	Redacted information at ¶ 451	Contains non-public information regarding negotiation strategy and which, if revealed to
24		competitive harm to Mote (See Whyrene
25		competitive harm to Meta. (See Khurana Decl. ¶ 6).
	Redacted information at ¶ 452	Contains non-public information regarding
26		negotiation strategy and which, if revealed to competitors or counterparties, could cause
27		competitive harm to Meta. (See Khurana
28		Decl. ¶ 6).

1	Redacted information at ¶ 454	Contains non-public information regarding
2		negotiation strategy and which, if revealed to competitors or counterparties, could cause
3		competitive harm to Meta. (See Khurana Decl. ¶ 6).
4	Redacted information at ¶ 455	Contains non-public information regarding negotiation strategy and which, if revealed to
5		competitors or counterparties, could cause
6		competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 6).
7	Redacted information at ¶ 456	Contains non-public information regarding advertising sales to individual advertisers
8		which, if revealed to competitors or
9		counterparties, could cause competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 9).
10	Redacted information at ¶ 458	Contains non-public information regarding negotiation strategy and which, if revealed to
11		competitive harm to Meta. (See Khurana
12		Decl. ¶ 6).
13	Redacted information at ¶ 459	Contains non-public information regarding negotiation strategy and which, if revealed to
14		competitors or counterparties, could cause competitive harm to Meta. (See Khurana
15		Decl. ¶ 6).
16	Redacted information at ¶ 460	Contains non-public information regarding negotiation strategy and which, if revealed to
17		competitors or counterparties, could cause
18		competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 6).
19	Redacted information at ¶ 461	Contains non-public information regarding negotiation strategy and which, if revealed to
		competitors or counterparties, could cause
20		competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 6).
21	Redacted information at ¶ 463	Contains non-public information regarding negotiation strategy and which, if revealed to
22		competitors or counterparties, could cause
23		competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 6).
24		Contains non-public information regarding
25		advertising sales to individual advertisers
26		which, if revealed to competitors or counterparties, could cause competitive harm
27	Dedected information of ¶ 464	to Meta. (See Khurana Decl. ¶ 9).
28	Redacted information at ¶ 464	Contains non-public information regarding specific terms of a contract with a business

1		counterparty which, if revealed to competitors
		or counterparties, could cause competitive
2		harm to Meta. (See Khurana Decl. ¶ 7).
3	Redacted information at ¶ 465	Contains non-public information regarding
		specific terms of a contract with a business
4		counterparty which, if revealed to competitors
ا ہ		or counterparties, could cause competitive
5		harm to Meta. (See Khurana Decl. ¶ 7).
6	Redacted information at ¶ 466	Contains non-public information regarding
		specific terms of a contract with a business
7		counterparty which, if revealed to competitors
		or counterparties, could cause competitive
8	D - 1 1 :- C	harm to Meta. (See Khurana Decl. ¶ 7).
9	Redacted information at ¶ 467	Contains non-public information regarding
		specific terms of a contract with a business counterparty which, if revealed to competitors
10		or counterparties, could cause competitive
		harm to Meta. (See Khurana Decl. ¶ 7).
11	Redacted information at ¶ 468	Contains non-public information regarding
12	Redacted information at 400	specific terms of a contract with a business
		counterparty which, if revealed to competitors
13		or counterparties, could cause competitive
14		harm to Meta. (See Khurana Decl. ¶ 7).
14	Redacted information at ¶ 469	Contains non-public information regarding
15	"	specific terms of a contract with a business
		counterparty which, if revealed to competitors
16		or counterparties, could cause competitive
17		harm to Meta. (See Khurana Decl. ¶ 7).
1 /	Redacted information at ¶ 470	Contains non-public information regarding
18		specific terms of a contract with a business
		counterparty which, if revealed to competitors
19		or counterparties, could cause competitive
20	D 1 4 1 C 4 4 4 4 7 1	harm to Meta. (See Khurana Decl. ¶ 7).
20	Redacted information at ¶ 471	Contains non-public information regarding
21		specific terms of a contract with a business
		counterparty which, if revealed to competitors or counterparties, could cause competitive
22		harm to Meta. (See Khurana Decl. ¶ 7).
23	Redacted information at ¶ 472	Contains non-public information regarding
23	Reducted information at 472	specific terms of a contract with a business
24		counterparty which, if revealed to competitors
25		or counterparties, could cause competitive
25		harm to Meta. (See Khurana Decl. ¶ 7).
26	Redacted information at ¶ 485	Contains non-public information regarding
	"	advertising sales to individual advertisers
27		which, if revealed to competitors or
20		counterparties, could cause competitive harm
28		to Meta. (See Khurana Decl. ¶ 9).

1	Redacted information at ¶ 486	Contains non-public information regarding
		advertising sales to individual advertisers
2		which, if revealed to competitors or
3		counterparties, could cause competitive harm
5		to Meta. (See Khurana Decl. ¶ 9).
4	Redacted information at ¶ 500	Contains non-public information regarding
_		specific terms of a contract with a business
5		counterparty which, if revealed to competitors
6		or counterparties, could cause competitive
0		harm to Meta. (See Khurana Decl. ¶ 8).
7	Redacted information at ¶ 501	Contains non-public information regarding
		specific terms of a contract with a business
8		counterparty which, if revealed to competitors
9		or counterparties, could cause competitive
9		harm to Meta. (See Khurana Decl. ¶ 8).
10	Redacted information at ¶ 502	Contains non-public information regarding
		specific terms of a contract with a business
11		counterparty which, if revealed to competitors
12		or counterparties, could cause competitive
12	D = 1 = 4 = 1 in forms = 4 in 502	harm to Meta. (See Khurana Decl. ¶ 8).
13	Redacted information at ¶ 503	Contains non-public information regarding
		advertising sales to individual advertisers
14		which, if revealed to competitors or counterparties, could cause competitive harm
1.5		to Meta. (See Khurana Decl. ¶ 9).
15	Redacted information at ¶ 509	Contains non-public information regarding
16	Redacted information at 507	specific terms of a contract with a business
		counterparty which, if revealed to competitors
17		or counterparties, could cause competitive
18		harm to Meta. (See Khurana Decl. ¶ 8).
10	Redacted information at ¶ 510	Contains non-public information regarding
19	"	specific terms of a contract with a business
		counterparty which, if revealed to competitors
20		or counterparties, could cause competitive
21		harm to Meta. (See Khurana Decl. ¶ 8).
21	Redacted information at ¶ 511	Contains non-public information regarding
22		specific terms of a contract with a business
		counterparty which, if revealed to competitors
23		or counterparties, could cause competitive
24		harm to Meta. (See Khurana Decl. ¶ 8).
∠ ႖	Redacted information at ¶ 512	Contains non-public information regarding
25		specific terms of a contract with a business
		counterparty which, if revealed to competitors
26		or counterparties, could cause competitive
27	Redacted information at ¶ 513	harm to Meta. (See Khurana Decl. ¶ 8).
- '	Redacted information at ¶ 313	Contains non-public information regarding specific terms of a contract with a business
28		counterparty which, if revealed to competitors
		counterparty which, if revealed to competitors

1		or counterparties, could cause competitive
		harm to Meta. (See Khurana Decl. ¶ 8).
2	Redacted information at ¶ 514	Contains non-public information regarding
3		specific terms of a contract with a business
		counterparty which, if revealed to competitors
4		or counterparties, could cause competitive
ا ہ		harm to Meta. (See Khurana Decl. ¶ 8).
5	Redacted information at ¶ 515	Contains non-public information regarding specific terms of a contract with a business
6		counterparty which, if revealed to competitors
7		or counterparties, could cause competitive
7		harm to Meta. (See Khurana Decl. ¶ 8).
8	Redacted information at ¶ 516	Contains non-public information regarding
		specific terms of a contract with a business
9		counterparty which, if revealed to competitors
10		or counterparties, could cause competitive
10		harm to Meta. (See Khurana Decl. ¶ 8).
11	Redacted information at ¶ 517	Contains non-public information regarding
		specific terms of a contract with a business
12		counterparty which, if revealed to competitors
13		or counterparties, could cause competitive
13		harm to Meta. (See Khurana Decl. ¶ 8).
14	Redacted information at ¶ 518	Contains non-public information regarding
		specific terms of a contract with a business
15		counterparty which, if revealed to competitors
16		or counterparties, could cause competitive
16	D 1 4 1: 6 4: 45.710	harm to Meta. (See Khurana Decl. ¶ 8).
17	Redacted information at ¶ 519	Contains non-public information regarding
		specific terms of a contract with a business counterparty which, if revealed to competitors
18		or counterparties, could cause competitive
19		harm to Meta. (See Khurana Decl. ¶ 8).
1)	Redacted information at ¶ 520	Contains non-public information regarding
20	223	specific terms of a contract with a business
		counterparty which, if revealed to competitors
21		or counterparties, could cause competitive
22		harm to Meta. (See Khurana Decl. ¶ 8).
	Redacted information at ¶ 521	Contains non-public information regarding
23		specific terms of a contract with a business
24		counterparty which, if revealed to competitors
24		or counterparties, could cause competitive
25		harm to Meta. (See Khurana Decl. ¶ 8).
	Redacted information at ¶ 522	Contains non-public information regarding
26		specific terms of a contract with a business
27		counterparty which, if revealed to competitors
21		or counterparties, could cause competitive
28		harm to Meta. (See Khurana Decl. ¶ 8).

1	Redacted information at ¶ 523	Contains non-public information regarding
2		specific terms of a contract with a business
2		counterparty which, if revealed to competitors
3		or counterparties, could cause competitive
	Redacted information at ¶ 524	harm to Meta. (See Khurana Decl. ¶ 8).
4	Redacted information at ¶ 324	Contains non-public information regarding specific terms of a contract with a business
5		counterparty which, if revealed to competitors
		or counterparties, could cause competitive
6		harm to Meta. (See Khurana Decl. ¶ 8).
7	Redacted information at ¶ 530	Contains non-public information regarding
_		specific terms of a contract with a business
8		counterparty which, if revealed to competitors
9		or counterparties, could cause competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 8).
10	Redacted information at ¶ 531	Contains non-public information regarding
10	"	specific terms of a contract with a business
11		counterparty which, if revealed to competitors
10		or counterparties, could cause competitive
12	Redacted information at ¶ 534	harm to Meta. (See Khurana Decl. ¶ 8). Contains non-public information regarding
13	Redacted information at 334	specific terms of a contract with a business
		counterparty which, if revealed to competitors
14		or counterparties, could cause competitive
15		harm to Meta. (See Khurana Decl. ¶ 8).
	Redacted information at ¶ 535	Contains non-public information regarding
16		specific terms of a contract with a business
17		counterparty which, if revealed to competitors
		or counterparties, could cause competitive harm to Meta. (<i>See</i> Khurana Decl. ¶ 8).
18		narm to weta. (See Kharana Beel. 6).
19	TT 10 00 000000	
20	IT IS SO ORDERED.	
20		
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22	Dated: March, 2022	The Honorable James Donato
22		United States District Court Judge
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